

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re AMERICAN INTERNATIONAL GROUP,  
INC. 2008 SECURITIES LITIGATION

Master File No. 08-CV-4772(LTS)(DCF)

**DEFENDANT ALAN FROST'S JOINDER IN OPPOSITION TO  
LEAD PLAINTIFF'S MOTION FOR CLASS CERTIFICATION**

Defendant Alan Frost (“Mr. Frost”) joins with American International Group (“AIG”), PricewaterhouseCoopers LLP (“PwC”) and the Underwriter Defendants in opposing Lead Plaintiff’s Motion for Class Certification, and hereby incorporates by reference the memoranda of law, supporting declarations and documentation submitted by these defendants in support of their opposition on August 17, 2011.

Mr. Frost respectfully urges this Court to deny Lead Plaintiff’s Motion for Class Certification for the reasons explained by AIG, PwC and the Underwriters Defendants.

DATED: New York, New York  
August 18, 2011

MILBANK, TWEED, HADLEY & McCLOY LLP

By: /s/ Dorothy Heyl  
Dorothy Heyl  
1 Chase Manhattan Plaza  
New York, NY 10005  
(212) 530-5000  
[dheyel@milbank.com](mailto:dheyel@milbank.com)

*Attorney for Alan Frost*

